

Washington University in St. Louis

SCHOOL OF LAW

Civil Justice Clinic
Interdisciplinary Environmental Clinic
May 10 2002

Mr David Mosby
Missouri Department of Natural Resources
Hazardous Waste Program
P O Box 176
Jefferson City, Missouri 65102

Via Fax 573-751 7869

A717
Site Herculaneum Lead
ID # MO006266373
Break 2.0
Other: 5-10-02

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STAFFORD DIVISION

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SUPERFUND RECORDS

Re Transmittal of Comments on the Doe Run April 2002 **Transportation and Material Handling Plan** and the September 2001 **Groundwater Monitoring Plan**, Herculaneum Missouri

Dear Mr Mosby,

This letter addresses comments on the Doe Run April 2002 Transportation and Material Handling Plan for the Herculaneum Lead Smelter submitted by The Doe Run Resource Corporation (Doe Run) as required under the Administrative Order on Consent Docket No 07 2002-0038 and the September 2001 Groundwater Monitoring Plan Herculaneum, Missouri submitted by Doe Run as required under the May 2001 Administrative Order on Consent Docket No VII-99 Comments are provided on behalf of the Missouri Coalition for the Environment

Transportation and Material Handling Plan for the Herculaneum Lead Smelter April 2002

The Coalition has reviewed the comments provided to the Doe Run Company by the USEPA on April 24 2002 on the Transportation and Material Handling Plan The Coalition supports the USEPA's disapproval of the plan as currently written and supports the comments provided to the Doe Run Company At this time the Coalition feels the comments and direction provided to the Doe Run Company are adequate and is not commenting further The Coalition reserves the right to comment on the subsequent required submittal of the Transportation and Materials Handling Plan if it feels it necessary to do so

Groundwater Monitoring Plan, Herculaneum, Missouri, September 2001

The Coalition provides the following general comments and raises the following questions on the Groundwater Monitoring Plan

- 1) The Groundwater Management Plan states in the first paragraph of the introduction that the " AOC and GMP covers the slag storage area of the Doe Run Lead Smelter at 881 Main Street in Herculaneum Missouri This is not

sufficient under the requirements of the May 2001 AOC While the AOC asks for a summary of previous investigations related to impacts from the slag pile area it does not limit the future groundwater investigation to the slag pile area In fact it states that future monitoring ' shall be sufficient to determine the extent origin direction and rate of movement of contaminant plumes onsite and off site 'The Groundwater Monitoring Plan should be designed to detect and monitor the extent of the contamination resulting from both the slag pile and other operations of the Doe Run Company in Herculaneum Lead contamination in the supposedly background well, indicates more extensive groundwater contamination that should be evaluated

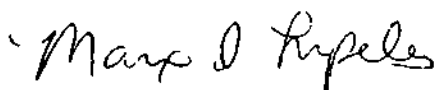
- 2) The Groundwater Monitoring Plan in several places refers the reader to other prepared plans to provide critical information pertinent to the subject of this plan such as geology/hydrogeology This is unacceptable This plan should exist as a complete document and pertinent information must be included
- 3) The Groundwater Monitoring Plan delineates "principal contaminant of concern by referencing previous sampling performed by the slag pile This statement is not supported No data is included and no information is provided about what contaminants have previously been tested for Determination of contaminants of concerns is critical Given recent accusations that Doe Run has used the slag pile area for disposal of other waste, sampling to evaluate contaminants of concern should include at a minimum a full 8260/8270 scan, the TAL metals and PCBs and pesticides
- 4) It is not clear whether historic and proposed metals analysis is for total metals or dissolved metals For example the text describes field filtering but then attributes an elevated lead result to elevated turbidity The Coalition supports requiring both analyses at least initially
- 5) The Groundwater Monitoring Plan describes the pH of the water as neutral but a preliminary review of the pH data indicates that the pH is generally below 7.0 which is not neutral Because the leachability of most metals increases as the pH decreases a pH below 7.0 deserves additional attention
- 6) The Groundwater Monitoring Plan references and draws conclusions from an EH pH plot that is not included
- 7) The Coalition questions the conclusion that the "nature and extent of contaminants originating from the slag pile have been adequately characterized From the information provided in this Groundwater Monitoring Plan, this conclusion is premature The plan lacks information on the geology and hydrogeology that would enable the evaluation of the system such as geologic cross sections elevation of the water table, the depth of Joachim Creek and evaluation of the interaction of the groundwater with Joachim Creek The Coalition questions the conclusion that the groundwater is 'mounding' beneath the slag pile The plan lacks information on data quality that would allow evaluation of previously collected data

¹ AOC May 2001 Appendix A Section IV(5)(A)(a)(9)

- 8) The review of the monitoring wells indicates no construction logs are available for wells one through seven and therefore construction details cannot be verified. Without knowing such basic information as well depth, length of screen, and well sealing procedures, the analytical data from these wells is not valid. The review also indicates that wells eight and nine were not constructed properly. These facts again support the Coalition's question of the claim of adequate characterization. How can an adequate characterization be conducted when data from 9 of the 14 total wells (and five of the nine regularly sampled) have quality questions?
- 9) Some of the references mentioned in the text are not included in the references list (i.e. Bediet, 1994, parenthetically referenced on page 7 of the Groundwater Monitoring Plan).

Thank you for the opportunity to comment on these plans. If you have any questions regarding our comments, please contact Beth Martin at 314-935 4136.

Sincerely,



Beth Martin, P.E. Engineering and Science Director
Maxine I. Lipeles, J.D. Director

Washington University Interdisciplinary Environmental Clinic
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